Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

RULE IN SHELLEY'S CASE — WHETHER APPLICABLE WHEN ANCESTOR'S ESTATE IS A VESTED REMAINDER. — A testator devised real estate to A for life, and at A's death to B. Should B predecease A, then the property was to go to B's heirs. B predeceased A. *Held*, that the heir of B takes by purchase under the will and not by descent, since the Rule in Shelley's Case cannot be applied where the ancestor takes a remainder and not an estate in possession. *Glendenning* v. *Dickinson*, 14 West. L. Rep. 419 (Brit. Columbia, Ct. App., June 1, 1910).

The only case found in point decides that the rule is applicable. *Wool* v. *Fleetwood*, 136 N. C. 460. And it is clear law that the rule applies when the ancestor's estate is a vested remainder which subsequently becomes the particular estate. *Spader* v. *Powers*, 56 Hun (N. Y.) 153; *Reutter* v. *McCall*, 192 Pa. St. 77; *Vangieson* v. *Henderson*, 150 Ill. 119. But nothing should turn on whether the remainder ever becomes an estate in possession, for if the rule operates upon the estate at all, it must operate when the estate vests in the ancestor, namely, the moment the instrument takes effect. See GRAY, RULE AGAINST PERPETUITIES, 2 ed., §§ 8, 9; CHALLIS, REAL PROP., 2 ed., 142. No such distinction can be deduced from the rule. *Shelley's Case*, 1 Coke 93 a, 104 a. The decision in the principal case seems to be based on the erroneous idea that the words "freehold" and "estate for life," occurring in the rule, mean only an estate in possession.

SCHOOLS AND SCHOOL DISTRICTS — READING BIBLE IN PUBLIC SCHOOLS. — In a public school, during school hours, the teacher conducted religious exercises, consisting of the reading of passages from the King James version of the Bible, reciting the Lord's Prayer as there found, and singing sacred hymns. The children of the relator, who was a Roman Catholic, were required to participate. The state constitution guarantees the free exercise and enjoyment of religious worship, and prohibits the appropriation of any public fund for any sectarian purpose. *Held*, that such exercises are unlawful. *People ex rel. Ring* v. *Board of Education of Dist. 24*, 92 N. E. 251 (Ill.).

It is generally agreed that religious exercises do not violate constitutional provisions guaranteeing freedom of worship, so long as the pupils need not be present or participate. *Billard* v. *Board of Education*, 69 Kan. 53; *Pfeiffer* v. *Board of Education*, 118 Mich. 560. *Contra*, *State ex rel. Weiss* v. *District Board, etc. of Edgerton*, 76 Wis. 177. Nor do such exercises make a public school a "place of worship." *Moore* v. *Monroe*, 64 Ia. 367; *Church* v. *Bullock*, 109 S. W. 115 (Tex.). The apparent conflict as to the meaning of "sectarian" is due largely to differences in the constitutional provisions wherein this word is used. The prevailing opinion is that reading from the King James version of the Bible does not make a public school a "sectarian school." *Stevenson* v. *Hanyon*, 7 Pa. Dist. 585; *Hackett* v. *Brooksville Graded School Dist.*, 120 Ky. 608. But the better view seems to be that this version is a "sectarian book," and that reading from it without comment or interpretation constitutes "sectarian instruction"; for the King James translation is the book adopted by the adherents of the Protestant faith as the basis of their beliefs, and reading therefrom without authoritative exposition is peculiar to that faith. *State ex rel. Weiss* v. *District Board, etc. of Edgerton, supra; State ex rel. Freeman* v. *Scheve*, 65 Neb. 853. *Contra*, *Hackett* v. *Brooksville Graded School Dist., supra.*

STATUTE OF FRAUDS — CONTRACTS NOT TO BE PERFORMED WITHIN ONE YEAR. — The plaintiff, a dairyman, employed the defendant under a contract terminable by either on one week's notice, but subject to an oral agreement that, for three years after quitting or being discharged from such employment, the defendant should not sell milk within a radius of four miles from the plaintiff's route, nor solicit his customers. The action was to enjoin breaches of the